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Memo

To: SPOE Staff, On-going Service Coordinators, Service Providers
From: CJ Hubbard, Assistant Director – Part C Compliance
Date: REVISED January 28, 2008
Re: IFSP Meetings

The following information is being provided because of concerns regarding federal and state Part C requirements related to conducting IFSP meetings. This document includes information on timelines, how meetings must be conducted, meeting participants, and the provision of written notification. The basis for the following information can be found in IDEA Part C Regulations sections 303.148, 303.321, 303.322, 303.342 and 303.343, and Missouri Part C Regulations Section VI. It is important that all intake and service coordinators review these regulations as well as the following instructions.

The Initial IFSP Meeting

What is an Initial IFSP Meeting?

The initial IFSP meeting is held after the child's eligibility has been determined and all necessary assessments have been conducted to assist the IFSP team in determining appropriate initial services.

When must the meeting be conducted?

It must be held within 45 days of the referral date unless there are documented parent or child related reasons for delaying the meeting. Reasons for the extension should be documented in case notes.

How must the meeting be conducted?

The meeting should be conducted in person; however, if any required member cannot be present, it is acceptable for them to participate in the meeting by conference call, or alternate means (see note #1 and #2 below).

Who are the required participants?

The meeting must include at a minimum:

- The parent or parents of the child;
- Other family members, as requested by the parent, if feasible to do so;
- An advocate or person outside of the family, if the parent requests that person participate;
- The Intake Coordinator for the child and family;
- The individuals who conducted evaluations or assessments used to determine eligibility or plan for the IFSP (see note #1 below); and,
- Service providers as appropriate (see note #2 below).

The ongoing Service Coordinator may be invited to the initial IFSP meeting if already assigned but is not a required participant.

NOTE #1: If the person(s) who conducted evaluations or assessments cannot attend, they may participate in one of the following ways: (1) by conference call; (2) by having a knowledgeable, authorized representative attend in their place; or, (3) by making pertinent records available at the meeting. The method of participation should be noted in the attendance section of the IFSP. If the child was found eligible based on a medical condition, the physician who made the diagnosis is considered part of the multidisciplinary team. If unable to attend, the physician's report must be made available at the IFSP meeting, and the physician should be indicated as participating by report. Participating by report means that the provider has provided a written report to the Intake Coordinator or they have provided information to the Intake Coordinator by phone. Either type of information must be available to the IFSP team at the time of the meeting.

NOTE #2: Generally, service providers (other than individuals who have conducted the evaluations or assessments) are not invited to the initial IFSP meeting except in the rare case that a child is already receiving some services through another funding source prior to the initial IFSP. The reason for this is that services are not to be pre-determined. The IFSP team determines what initial services the child will need based upon the outcomes developed during the IFSP meeting.

Interim IFSP Meeting (303.345, 303.322 (c)(2)); State Plan VI

There are two circumstances in which it is appropriate to develop and implement an Interim IFSP. In each circumstance, the Intake Coordinator has sufficient information to determine the child is eligible, but all the necessary assessments have not yet been conducted to plan for the initial IFSP meeting. An example of each follows:

1. Interim IFSP before 45 days (Indicator 3000.220)

A child has obvious immediate needs for early intervention services, e.g., an urgent need to learn to oral feed or s/he will be placed on tube feeding. In this case, it would be appropriate for an interim IFSP to be developed in order for the child to receive occupational therapy services as soon as possible. The remaining assessments must still be completed within 45 days of the referral date.

2. Interim IFSP exceeding 45 days (Indicator 3000.490)

Because of exceptional circumstances, e.g., a child is ill or having surgery, it is impossible to complete all evaluations/assessments within 45 days. An interim IFSP would be completed to allow for initiation of early intervention services for the child. The inability to complete assessments within 45 days must be related to family and/or child reasons, and not based on administrative delays.

How must meetings be conducted?

See Initial IFSP section above.

Who are the required participants?

See Initial IFSP section above.

Periodic Reviews

What is a Periodic Review?

State and Federal regulations refer to periodic reviews as the required six month review, and those meetings that are scheduled more frequently if conditions warrant, or if the family requests such a review. In Missouri we refer to the meetings that are scheduled more frequently if conditions warrant as **interperiodic** reviews to distinguish them from the required **six month** reviews. Periodic reviews are conducted to determine the degree to which progress toward achieving outcomes is being made and whether modification or revision of the outcomes or services is necessary.

When must the periodic meeting be conducted?

A **six month review** of the IFSP **must** occur no more than six months after the initial or annual IFSP meeting date. **There are no allowable exceptions to this timeline.** It is important to plan ahead and schedule the meeting in ample time to ensure compliance with this requirement. It is acceptable to hold a six month review up to a month prior to the six month due date.

Interperiodic reviews are scheduled as conditions warrant. This may occur when the service coordinator receives a request from the family or a provider, or the service coordinator is aware of problems or concerns that need to be discussed prior to the required six month or annual review of the IFSP.

How must the periodic reviews be conducted?

For six month reviews, the service coordinator may schedule a face to face meeting, or may call the parent and each member of the IFSP team to determine progress on outcomes and find out if any changes to the IFSP are warranted. If no changes to outcomes or services are needed, the team may decide no meeting is necessary; however, the service coordinator must document this decision in case notes and complete the IFSP for the six month review.

If any IFSP team member wants to discuss a possible change in outcomes and/or services, it is our expectation that a meeting will be conducted because of the potential for a change in outcomes and/or services on the IFSP. When a six month review is being conducted by meeting, the service coordinator must send out the meeting notification form to all appropriate participants early enough to ensure their attendance. (See section on meeting notification requirements at the end of the document.) If a service provider cannot attend or participate by conference call, the service coordinator should attempt to obtain a written report; however they must not delay the meeting beyond the required timelines.

Interperiodic reviews: Because an interperiodic review is only held when someone on the team has requested a team meeting to discuss issues that may result in a change in the outcomes or services on the IFSP, it is our expectation that a meeting must be held. All provisions listed above for conducting the six month review meeting, when it has been determined a meeting is necessary, apply.

Who are the required participants?

- The parent or parents of the child;
- Other family members, as requested by the parent, if feasible to do so;
- An advocate or person outside of the family, if the parent requests that the person participate;
- The ongoing service coordinator for the child and family;
- The individuals who conducted evaluations or assessments used to plan for the IFSP, as appropriate; and
- Service providers, as appropriate.

NOTE: If conditions warrant, provisions must be made for the participation of the child's service providers and individuals who have conducted assessments for the purpose of planning for the current IFSP. The service coordinator may invite all providers for the child, but **at a minimum**, must invite any providers who are providing services that will be discussed because of the potential need for changes in those services or related outcomes and strategies.

Annual IFSP Meeting:**What is an annual review?**

An annual review is conducted to determine the degree to which progress toward achieving outcomes is being made and whether modification or revision of the outcomes and/or services is necessary.

When must the meeting be conducted?

The annual IFSP meeting **must be held** no more than 365 days after the initial or previous annual IFSP meeting. **There are no allowable exceptions to this timeline.**

How must the meeting be conducted?

The meeting should be conducted in person; however, if any required member cannot be present, it is acceptable for them to participate by conference call.

Who are the required participants?

See list of participants of periodic meetings above.

It is expected that the service coordinator will invite all of the child's current First Steps service providers to the annual IFSP meeting in order to facilitate a complete and meaningful meeting to evaluate the IFSP. If a service provider cannot attend or participate by conference call, the service coordinator must not delay the meeting beyond the required timelines in order to find a workable date. In this case, the service coordinator should attempt to obtain a written report or take a report by phone so the provider can participate by report. If the person(s) who conducted ongoing assessments for the purpose of IFSP planning cannot attend, they may participate in one of the following ways: 1) by conference call; 2) by having a knowledgeable, authorized representative attend; or, 3) by making pertinent records available at the meeting. The method of participation should be noted on the attendance page of the IFSP.

Transition from Part C at Age Three

What is a Transition Meeting?

The purpose of the transition meeting is to discuss the plan and procedures necessary to prepare the family for changes in service delivery including steps to help the child adjust and function in a new setting. With the parent's permission, outside agencies are invited to the meeting so the parents can learn more about programs available to their child after age three.

When must the meeting be conducted?

State regulations [State Plan (F)] indicate the transition from Part C at age 3 will occur six months prior to the child's third birthday. This has been interpreted by DESE to mean by the time the child is 2.5 years old. It is acceptable to hold a transition meeting one to three months prior to the time the child is 2.5 years old. Extensions to this timeline are allowable for parent or child reasons. Be sure to document the reasons for the extension in case notes.

How must the meeting be conducted?

The meeting should be conducted in person; however, if any required member cannot be present, it is acceptable for them to participate by conference call.

Who are the required participants?

The meeting must include at a minimum:

- The parent or parents of the child;
- Other family members, as requested by the parent, if feasible to do so;
- An advocate or person outside of the family, if the parent requests that the person participate;
- The family's ongoing service coordinator;
- The child's service providers, as appropriate;
- The individuals who have conducted assessments for the purpose of IFSP planning, as appropriate; and,
- LEA or other community early childhood programs, with parental permission.

It is expected that the service coordinator will have discussed several transition options prior to planning the transition meeting to know who the parent would like to invite to learn more about various programs for their child (e.g., the Local Education Agency, Headstart, etc.). If the service coordinator has the parent's permission to invite agency/program representatives, then they **must** be invited. If the LEA or another agency was invited, but was unable to attend the transition meeting, the Service Coordinator must conduct the transition meeting without them. If the parent does not want to invite the LEA or another agency, the service coordinator should document this in case notes and conduct the transition meeting even if it is just the family and the service coordinator attending.

Written meeting notification

Federal and state regulations implementing Part C of the Individuals with Disabilities Education Act (IDEA) require that meeting arrangements must be made and **written notification** provided to the family and other participants early enough to ensure that they will be able to attend. The First Steps meeting notification may be mailed, emailed, or faxed to the parent and all participants. This notification must be sent at least 10 days prior to the meeting unless there is a necessity to hold the meeting sooner and the parent agrees to the earlier date. While the regulations require meeting notification be sent to all participants, the regulations do not require that the meeting be held only when all participants are able to attend. A hard copy of the completed meeting notification should be placed in the child's early intervention record.

Holding IFSP meetings without parent participation

While it is not something that would be done routinely, there are some circumstances in which a service coordinator may determine it is necessary to hold a meeting without a parent's participation after making the appropriate attempts to notify the parent of the meeting. For example, a corrective action may have been ordered based upon a child complaint, requiring the convening of the IFSP team within a given period of time to discuss compensatory services. If the family has been contacted and is not responsive or has not followed through with meeting attendance, this would be a time when it would be necessary to proceed with the IFSP meeting without the family's participation.

There may also be circumstances in which the service coordinator has made multiple attempts to schedule and hold an IFSP meeting and the parent does not show up for the meeting that has been scheduled, but the child is continuing to receive services. In cases such as these, the service coordinator should hold the meeting without the parent following these procedures:

The service coordinator must make two attempts to notify the family of the meeting. Each attempt must include written notification through mail, email or fax. On each attempt, the service coordinator must provide the family written notification at least 10 calendar days prior to the meeting unless the family agrees to hold the meeting sooner. If the meeting has been scheduled and the family does not show up for the first meeting, the service coordinator must make the second attempt to schedule the meeting. If the first meeting was scheduled at the home, the service coordinator may wish to schedule the second meeting at the SPOE office or another neutral site, so that if the family does not attend, the other participants may proceed with the meeting.

Because successful early intervention is dependent on family engagement and participation in the IFSP process, it is expected that holding IFSP meetings without the family present would be the exception, rather than the rule.

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